

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOUGLAS JOHNSON,)	
)	22 CV 3718
Plaintiff,)	
)	Judge Robert W. Gettleman
)	
vs.)	
)	
)	
)	
COOK COUNTY SHERIFF THOMAS J.)	
DART, in his official capacity, ANTWAUN)	
BACON, a CCDOC officer, and COOK COUNTY,)	
a municipal corporation,)	
)	
)	
)	
Defendants.)	

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Defendants, Cook County Sheriff Thomas J. Dart (“Defendant Sheriff”) and Cook County, by and through their counsel, EILEEN O’NEILL BURKE, State’s Attorney of Cook County, through her assistant, REBECCA J. LAUE, and pursuant to Fed. R. Civ. P. 56, move this Honorable Court for summary judgment in his favor and against the Plaintiff, Douglas Johnson. In support of this Motion, Defendants submit: (1) Local Rule 56.1(a)(2) memorandum of law; and Local Rule 56.1(a)(3) statement of undisputed material facts and supporting exhibits.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an Order: (a) granting summary judgment in Defendants’ favor and against the Plaintiff; (b) assessing Defendants’ costs against the Plaintiff; and (c) providing Defendants with any other necessary and just relief.

Dated: June 12, 2025

Respectfully submitted,

EILEEN O'NEILL BURKE
State's Attorney of Cook County

By: /s/ Rebecca J. Laue
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CERTIFICATE OF SERVICE

I, Rebecca J. Laue, hereby certify on June 12, 2025, I have caused a true and correct copy of *Defendants' Motion for Summary Judgment* Pursuant to Fed. R. Civ. P. 56 and N.D. Ill. Local Rule 56.1 and in accordance with Federal Rules of Civil Procedure and applicable local rules governing the electronic filing and service of documents be sent via U.S.P.S. to Plaintiff in accordance with the rules regarding the electronic filing and service of documents..

/s/ Rebecca J. Laue
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